

SUSMAN GODFREY

January 2, 2025

Hon. Ona T. Wang
 United States District Court
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street
 New York, NY 10007

RE: No. 20-cv-4322, *King v. Habib Bank Limited*, Plaintiffs' Letter Requesting Status Conference

Dear Judge Wang,

Plaintiffs request a status conference at the Court's earliest convenience, whether in-person or telephonic. Plaintiffs wish to discuss the pending motions listed below, which have been fully briefed and will impact the issues discussed in Plaintiffs' opening expert reports. The fact discovery deadline is January 3, 2025, and the deadline for opening expert reports is January 31, 2025.¹

1. Plaintiffs' Motion to Compel HBL to Produce Complete Transactional Data for True Positive Accounts (Dkts. 322, 342, 358)
2. Plaintiffs' Motion to Compel HBL to Produce Foreign Regulator Inspection Reports (Dkts. 324, 333, 338, 348, 355, 364)
3. Plaintiffs' Letter Brief Regarding Privilege Disputes (Submitted *In Camera* to Chambers on August 8, 2024 pursuant to the Court's July 31, 2024 Order at Dkt. 286)

Respectfully submitted,

/s/ Danielle Nicholson
 Ian M. Gore (IG2664)
 Katherine M. Peaslee (Pro Hac Vice)
 Danielle Nicholson (Pro Hac Vice)
 SUSMAN GODFREY L.L.P.
 401 Union Street, Suite 3000
 Seattle, WA 98101
 Tel: (206) 505-3841
 Fax: (206) 516-3883
 igore@susmangodfrey.com
 kpeaslee@susmangodfrey.com
 dnicholson@susmangodfrey.com

¹ As noted in the December 27, 2024 Joint Status Letter (Dkt. 375 at 4), Plaintiffs believe an extension of fact discovery is necessary to provide sufficient time to receive and review any transactional data, regulatory reports, and withheld documents that the Court orders for production.

Seth D. Ard (SA1817)
SUSMAN GODFREY L.L.P.
One Manhattan West, 50th Floor
New York, NY 10001
Tel: (212) 336-8330
Fax: (212) 336-8340
sard@susmangodfrey.com

Steven Sklaver (Pro Hac Vice)
Michael Adamson (MA9434)
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel: (310) 789-3100
Fax: (310) 789-3150
ssklaver@susmangodfrey.com
madamson@susmangodfrey.com

Ryan Sparacino (Pro Hac Vice)
Tejinder Singh (TS0613)
SPARACINO PLLC
1920 L Street, NW
Suite 835
Washington, D.C. 20036
Tel: (202) 629-3530
ryan.sparacino@sparacinoplcc.com
tejinder.singh@sparacinoplcc.com

Counsel for Plaintiffs